

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JEHAN ZIBOUKH, MARGRET PHILIE,
VERA FIGLOCK, NICOLE MAY, TYANA
DAUGHTERY, SOLALIZ HERNANDEZ,
DEBRA KRYSTYN, I.E., A MINOR,
CYNTHIA RODRIGUEZ, J.P., A MINOR,
MIGUEL ACOSTA, VINSON MANGOS,
NOAH KUPPER, J.P. A MINOR, CHRISTIAN
VEGA, A.H. A MINOR, AND OLAYA
BOURAKKADI AMRANI, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

WHALECO INC. D/B/A TEMU, AND PDD
HOLDINGS INC. F/K/A PINDUODUO INC.,

Defendants.

Case No. 1:23-cv-15653

District Judge Thomas M. Durkin

Magistrate Judge Maria Valdez

PLAINTIFFS' MOTION TO TRANSFER VENUE

Plaintiffs move, pursuant to 28 U.S.C. § 1404(a), to transfer venue to the Eastern District of New York. This Motion is supported by the Memorandum of Law in Support of Plaintiffs' Motion to Transfer Venue, the Declaration of Steve W. Berman and accompanying exhibits, and all of the files, records, and proceedings herein. Defendants have expressed that they intend to oppose this motion.

Plaintiffs respectfully request that the Court enter an order transferring this action to the Eastern District of New York.

DATED: March 29, 2024

Respectfully submitted,

/s/ Steve W. Berman

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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2024, a true and correct copy of the foregoing was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

/s/ Steve W. Berman
Steve W. Berman